

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SEVEN NETWORKS, LLC,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Civil Action No. 2:17-cv-00442-JRG

LEAD CASE

JURY TRIAL DEMANDED

FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER

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SEVEN NETWORKS, LLC,

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JURY TRIAL DEMANDED

DECLARATION OF BRIAN KING
IN SUPPORT OF GOOGLE INC.'S MOTION TO TRANSFER VENUE
TO THE NORTHERN DISTRICT OF CALIFORNIA

FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER

I, Brian King, declare and state as follows:

■ [REDACTED]

[REDACTED]

[REDACTED]

2. I provide this declaration in support of Google's motion to transfer venue to the Northern District of California. I submit this declaration based on my knowledge of the corporate structure of Google and my investigation of the location of witnesses and evidence relevant to the functionality that Plaintiff SEVEN Networks, LLC ("SEVEN") has identified as allegedly infringing in its May 17, 2017 Complaint.

3. I understand that the Complaint accuses Google of directly, and in some cases indirectly, infringing certain claims of certain asserted patents. I understand that SEVEN has identified (1) certain power management functions in the Nexus 5X/6P, Pixel, and Pixel C phones, (2) the Google Play Store, and (3) Google's "registration and 2-Step Verification process" (collectively, the "accused products and services") as allegedly infringing the asserted patents.

■ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

■ [REDACTED]

[REDACTED]

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[REDACTED]

6. Google has been headquartered in the Northern District of California since its founding in 1998. It has been headquartered in Mountain View, California, in the Northern District of California, since at least 2004.

7. Google has been incorporated in Delaware since 2002.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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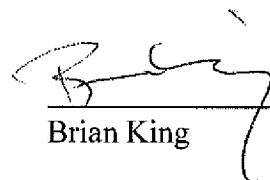
[REDACTED]

[REDACTED]

14. Google does not maintain an office in the Eastern District of Texas, which I understand includes the counties identified on the Court's website (<http://www.txed.uscourts.gov/court-locator>). Accordingly, Google has no employees who work at any Google office in the Eastern District of Texas.

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 2, 2017, in Sunnyvale, California.



Brian King

Dated: October 3, 2017

Respectfully submitted,

/s/ Sean S. Pak

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who have consented to electronic service were served with a copy of this document via electronic mail on October 2, 2017. I also hereby certify that all counsel of record who have consented to electronic service were served with a notice of filing of this document, under seal, pursuant to L.R. CV-5(a)(7) on October 2, 2017.

/s/ Brian Mack

CERTIFICATE OF AUTHORIZATION TO FILE UNDER SEAL

I hereby certify that the foregoing document was filed contemporaneously with Defendant's Motion for Leave to File Under Seal Its Motion to Transfer Venue to the Northern District of California, Declarations, and Exhibits in accordance with Local Rule CV-5(a)(7).

/s/ Brian Mack